

Stephen D. Finestone (125675)  
Jennifer C. Hayes (197252)  
Ryan A. Witthans (301432)  
FINESTONE HAYES LLP  
456 Montgomery Street, Floor 20  
San Francisco, CA 94104  
Telephone: (415) 616-0466  
Facsimile: (415) 398-2820  
Email: sfinestone@fhllawllp.com  
Email: jhayes@fhllawllp.com  
Email: rwitthans@fhllawllp.com

Attorneys for Creditor  
Roebbelen Contracting, Inc.

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re  
**PG&E Corporation,**  
  
Debtor-in-Possession.

Case No. 19-30088-DM  
Chapter 11  
Hon. Dennis Montali

In re  
**Pacific Gas and Electric Company,**  
  
Debtor-in-Possession.

Case No. 19-30089-DM  
Chapter 11  
Hon. Dennis Montali

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

**ROEBBELEN CONTRACTING, INC.'S  
EIGHTEENTH NOTICE OF  
CONTINUED PERFECTION OF  
MECHANICS LIENS PURSUANT TO  
§ 546(b)(2)**

Roebbelen Contracting, Inc. ("Roebbelen") hereby files its Eighteenth Notice of Continued Perfection of Mechanics' Liens Pursuant to 11 U.S.C. § 546(b)(2) (the "Notice") and in support thereof states as follows:

1. On January 29, 2019 (the "Petition Date"), the above-captioned debtors (the "Debtors") filed voluntary Chapter 11 bankruptcy petitions.

ROEBBELEN CONTRACTING, INC.'S EIGHTEENTH NOTICE OF CONTINUED PERFECTION OF MECHANICS LIENS PURSUANT TO § 546(b)(2)

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2. As of the Petition Date, Roebbelen had approximately 80 projects under construction in support of the Debtors' strategic initiatives of safety, reliability, affordability, and consumer focus. The improvements performed by Roebbelen are designed to result in quicker response times, improved vehicle maintenance, better logistics for replacement materials, hazardous materials storage, and improvements to dispatch conference centers, including solutions for mapping, tracking outages, and safety trainings. Roebbelen's work also relates to a security program for these same facilities, which Roebbelen is informed and believes have been identified by the Department of Homeland Security as known targets, including upgrading their fencing and security systems to meet improved security standards.

3. Before and after the Petition Date, Roebbelen has provided labor, services, equipment, and materials for works of improvement owned by Pacific Gas & Electric Company located in Solano County, California (among others). Roebbelen has lien rights (the "Lien") related to these works of improvement. *See* Cal. Civ. Code § 8050(a) (defining works of improvement).

4. Through the filing of this Notice, the amount owing to Roebbelen on account of the Lien is at least \$36,552.76, not including interest and other charges, with additional amounts accrued and owed after the filing of this Notice.

5. Roebbelen properly perfected its Lien pursuant to California Civil Code §§ 8400 *et seq.* by timely recording its Lien in the above-named county. *See* Cal. Civ. Code § 8412 (establishing deadlines for contractor to record lien claims). An authentic copy of the Lien is attached to this Notice as **Exhibit A**.<sup>1</sup>

6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be filed within 90 days after recordation of the lien. The automatic stay imposed by 11 U.S.C. § 362(a) precludes Roebbelen from filing an action to enforce its Lien. When applicable law requires commencement of an action to perfect, maintain, or continue the perfection of an interest in property, and the action was not filed prior to the bankruptcy petition date, then the claimant must

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<sup>1</sup> To the extent that there is a discrepancy between this Notice and the attached recorded document, the attached recorded document shall control. Roebbelen reserves the right to modify the Lien, such as to increase or decrease the amount.

1 instead give notice within the time fixed by law for filing the action. 11 U.S.C. § 546(b); *Village*  
2 *Nurseries v. Gould (In re Baldwin Builders)*, 232 B.R. 406, 410–15 (B.A.P. 9th Cir. 1999); *see Village*  
3 *Nurseries v. Greenbaum*, 101 Cal. App. 4th 26 (2002).

4 7. Roebbelen hereby provides notice of its rights as a perfected lienholder pursuant to  
5 California’s law as to the Lien. To comply with all applicable law, including California state law and  
6 bankruptcy law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), Roebbelen is filing and serving this  
7 Notice to preserve, perfect, maintain, and continue the perfection of its Lien and its lien rights in the  
8 properties identified therein. This Notice constitutes the legal equivalent of having commenced an  
9 action to foreclose the Lien in the proper court. Roebbelen intends to enforce its lien rights to the  
10 fullest extent permitted by law. The interests perfected, maintained, and/or continued by the Lien  
11 extend to the proceeds, products, rents, and profits of the lien properties.

12 8. Roebbelen reserves all rights, including the right to amend or supplement this  
13 Notice.

14 Dated June 29, 2020

FINESTONE HAYES LLP

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16 Ryan A. Witthans  
17 Counsel for Creditor  
Roebbelen Contracting, Inc.